

7 April 1999

Carter Scholz  
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Re: FDA Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food" APR 13 10:01

To whom it may concern:

The FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated foods.

In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, by the FDA's own reasoning, labeling should remain.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers have a right to know if this process has been used on their food. If there is no label, consumers will be misled into believing the food has not been irradiated. This would be untruthful concealment of a material fact.

I support the recommendation by the Center for Science in the Public Interest:

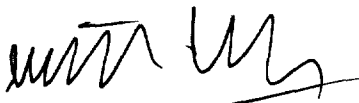
"any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process.

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

I further urge you to place the comments received on the Internet so that the public can be informed about who is participating in this comment process.

Yours truly,



cc: Sen. Dianne Feinstein, Sen. Barbara Boxer, Rep. Barbara Lee

98N-1038

C611

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